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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
BBL BUILDERS, LP	§	Case No. 16-41880
	§	
DEBTOR	§	

MOTION TO SELL PROPERTY OF THE ESTATE

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, BBL Builders, LP Debtor in the above styled and numbered cause and files this its Motion to Sell Property of the Estate (“Motion”) and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Emergency Motion constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).
2. The Debtor commenced this proceeding on October 14, 2016 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of its assets and continued in

operation of its business as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.

- 3 The Debtor's business is the construction of Multi-family properties.
4. Upon the filing the Debtor determined that it was not in a position to finish several of the projects it was working on and the Debtor rejected those projects.
5. The Debtor believed it could finish three projections: Avilla in Plano Texas; The Sound at Navarre Florida; and Altis in Austin, Texas. The allowed the Debtor to assume these projects.
6. At the time of the bankruptcy filing, the Debtor believed it would be able to obtain new work and complete the projects that it had assumed.
7. The Debtor has been unable to obtain new work, and the Debtor has continued the incur post petition debt.
8. The Debtor desires to sell its interest in the Avilla Plano project.
9. As a result of the on going costs assocaited with the Avill Project as well as the Debtors warranty on the Avilla project, the Debtor no longer believes it can sustain the Avilla project.
10. The Debtor seeks to sell the Avilla Project along with all liabilities and warranties associated therewith to Bette Cring LLC ("BCL") for a price of \$35,000.
11. Additionally, at the time of filing the Debtor had several vehicles which were used by employees of the Debtor.
12. The Debtor desires to sell these vehicles to the employees.
13. The list of vehicles, buyers and prices are as follows:

2013 GMC Yukon	Mark Bette	\$15,135
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2013 Lexus	Mark Bette	\$15,935
2014 Subaru	Mary Ellen Cusano	\$8,775
2004 Box Truck	Mark Bette	\$2,500

14. The sale of these vehicles will provide the Debtor with additional capital and decrease the costs of insurance and current employee benefits for vehicle allowance.
15. There are no liens against these vehicles.
16. The Debtor would show the prices are fair and are based upon Blue book values for the vehicles.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Hearing and that upon hearing, this Court enter an Order authorizing the Debtor's Sale of the Property described in the Motion, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins  
Eric A. Liepins, SBN 12338110  
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent to all creditors via mail on this the 6th day of February 2017.

/s/ Eric Liepins  
Eric A. Liepins

